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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.  
PARDINI IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF  
PARTIES' AMENDED JOINT  
PROPOSED PRETRIAL ORDER  
(DKT. 2256)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm  
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal  
4 knowledge and if called as a witness, I could and would competently testify to the matters set  
5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion  
6 to File Under Seal Portions of Parties' Amended Joint Proposed Pretrial Order (Dkt. 2256).

7 2. I have reviewed the following documents and confirmed that only the portions  
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Appendix A to Amended Joint Proposed Pretrial Order	Entire Document
Appendix D to Amended Joint Proposed Pretrial Order	Red Highlights

14 3. Appendix A is an exhibit list containing brief descriptions of thousands of exhibits  
15 in this case, including those that contain highly confidential information regarding third party  
16 vendors, some of whom have NDAs with Uber, interspersed throughout the exhibits list. This  
17 information is not publicly known, and its confidentiality is strictly maintained. Defendants  
18 request this information be sealed to protect these confidential business relationships from  
19 disclosure and possible interference from competitors.

20 4. The red highlights of Appendix D contain contact information of individuals  
21 involved in this case, including personal phone numbers, email addresses, and home addresses.  
22 Defendants seek to seal this information in order to protect the privacy of these individuals  
23 because this lawsuit is currently the subject of extensive media coverage. Disclosure of this  
24 information could expose these individuals to harm or harassment.

25 5. Defendants' request to seal is narrowly tailored to the portions of the Joint  
26 Proposed Pretrial Order and supporting appendices that merit sealing.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
2 27th day of November, 2017 at San Francisco, California.

3  
4 /s/ Thomas J. Pardini

Thomas J. Pardini